

Honorable Marsha J. Pechman

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

HUONG HOANG, an individual,

NO. 11-cv-01709-MJP

Plaintiff,

vs.

AMAZON.COM, INC., a Delaware  
corporation, and IMDB.COM, INC., a  
Delaware corporation,

**DECLARATION OF CHARLOTTE  
WILLIAMS IN OPPOSITION TO  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

Defendants.

I, Charlotte Williams, do declare and attest as follows:

1. I am over the age of eighteen (18) years of age, counsel of record for Plaintiff Huong Hoang, and competent to testify to the matters stated herein.

2. I examined the documents produced by Ms. Hoang during discovery that detail the amount of income she earned from acting. These documents included:

a. HOANG 000021-23, which is attached as Exhibit GG to the Deposition of Breena Roos dated November 29, 2012;

b. HOANG 000167-69, which is attached as Exhibit WW to the Deposition of Breena Roos dated November 29, 2012; and

3. I also reviewed the information reflected in Exhibits A and B to Ms. Hoang's declaration filed in opposition to Defendants' motion for summary judgment.

1 Based on these documents, I prepared the following chart and table, attached hereto as  
2 Exhibit A and filed under seal, which summarize the content of HOANG 000021-23,  
3 HOANG 000167-69, and Exhibit A to Ms. Hoang's declaration.

4 4. Excerpts from the August 7, 2012 deposition transcript for Ms. Hoang are  
5 attached hereto as Exhibit B.

6 5. Exhibit C is a true and correct copy of Amazon.com's privacy policy.

7 I certify and declare under the penalty of perjury under the laws of the United  
8 States that to my knowledge the foregoing is true and correct.

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10 Dated this 17th day of December, 2012 at Seattle, Washington.

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12 /s Charlotte Williams  
13 Charlotte Williams  
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